

Kun Zhao
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Attorneys for Plaintiff
Tsann Kuen (Zhangzhou) Enterprise Co., Ltd.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

TSANN KUEN (ZHANGZHOU)
ENTERPRISE CO., LTD. ,

Plaintiff,

- against -

ALAN J. SUTTON, MICHAEL C. YEUNG,
JESSICA FALASCA, d/b/a "INTERACTIVE
GROUP LIMITED,"

Defendants.

Civ. No.: 12-cv-4471 (RMB) (AMD)

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FILED**

**NOTICE OF MOTION TO
STRIKE DEFENDANTS'
ANSWER AND TO ENTER
DEFAULT UPON DEFENDANTS**

Motion Date: June 17, 2013

TO: Andrew Bronsnick, Esq.
Massood & Bronsnick, LLC
50 Packanack Lake Road East
Wayne, NJ 07470-6663

PLEASE TAKE NOTICE that on June 17, 2013 at 9:00 a.m., or as soon after as counsel may be heard, the undersigned attorneys for Plaintiff Tsann Kuen (Zhangzhou) Enterprise Co., Ltd., in the above captioned matter, will move before the Honorable Renee Marie Bumb, U.S.D.J., at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101 for an Order granting Plaintiff's motion to (1) strike Defendants' Answer pursuant to Fed. R. Civ. P. 16 (f) (1) and 37

(b) (2) (A); (2) enter default upon Defendants pursuant to Fed. R. Civ. P. 55 (a); and (3) impose attorney's fees and expenses of this motion on Defendants pursuant to Fed. R. Civ. P. 16 (f) (2).

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the attached Brief, Certification of Kun Zhao, Certification of Chijui Chiu and the exhibits attached thereto. A Proposed Order is also enclosed.

Respectfully submitted,
HILL WALLACK LLP

By: s/ Kun Zhao
Kun Zhao

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Dated: May 24, 2013